

<b>In re:</b>	)	
<b>Juana Ortiz,</b>	)	<b>Case No.: 5:22-bk-00155-MJC</b>
<b>Debtor.</b>	)	<b>Chapter 13</b>
<hr/>	)	
<b>Kingdom RCG Evergreen Fund Series I LLC,</b>	)	<b>Trustee Jack N. Zaharopoulos</b>
<b>Movant,</b>	)	
<b>v.</b>	)	<b>Jude Mark J. Conway</b>
<b>Juana Ortiz,</b>	)	
<b>Respondent.</b>	)	

**NOTICE OF DEFAULT STIPULATION [DOC. NO. 75]**

- Case 5:22-bk-00155-MJC Doc 85 Filed 04/09/25 Entered 04/09/25 11:44:25 Desc  
Main Document Page 1 of 2

Date: April 9, 2025

DWALDMANLAW, P.C.  
4900 Carlisle Pike, #182  
Mechanicsburg, PA 17050  
Telephone: (844) 899-4162  
Facsimile: (844) 882-4703  
Email 1: jennie@dwaldmanlaw.com  
Email 2: tiffany@dwaldmanlaw.com  
Attorneys for Secured Creditor

By: /s/ Jennie C. Shnayder

Jennie C. Shnayder, Esq.  
PA Bar ID# 315213

**SERVICE LIST:**

*Debtor*

Juana Ortiz  
620 N. Putnam St.  
West Hazleton, PA 18202

Tullio DeLuca  
381 N. 9th Avenue  
Scranton, PA 18504  
*Debtor(s) Attorney*

*Trustee*

Jack N Zaharopoulos  
Standing Chapter 13  
(Trustee)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

*Asst. U.S. Trustee*

United States Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102